

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

<b>HARRY T. COLLINS,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. 05-624-SLR</b>
	)	
<b>WARDEN RAPHAEL WILLIAMS, et al.</b>	)	<b>Jury Trial Demanded</b>
	)	
<b>Defendants.</b>	)	

**REQUEST FOR PRODUCTION OF DOCUMENTS - I OF DEFENDANT,  
CORRECTIONAL MEDICAL SERVICES, INC. (INCORRECTLY DESIGNATED AS  
"CORRECTIONAL MEDICAL SYSTEMS") ("CMS") DIRECTED TO PLAINTIFF**

Defendant, CMS, by its attorneys, Marshall, Dennehey, Warner, Coleman and Goggin, hereby requests that plaintiff produce and permit defendant to inspect and copy the following documents within thirty (30) days of the service of this request:

1. All statements of any and all witnesses, including any statements from the plaintiff or defendant herein regarding the happening of the incident here involved and/or the circumstances leading up to or subsequent to the incident.
2. All statements which may have been taken in connection with this litigation, including written statements, transcriptions of recorded interviews and summaries of oral statements.
3. All photographs, diagrams, plans or graphic representations of the scene of the alleged accident herein involved.
4. Any and all documents containing the names and business addresses of all individuals contacted as potential witnesses.

5. All bills, receipts, or any other documentation whatsoever regarding medical treatment which plaintiff secured as a result of the incident which is the subject of this litigation.

6. All bills, receipts, or other documentation whatsoever regarding medical expenses which the plaintiff allegedly suffered as a result of the incident which is the subject of this litigation.

7. All reports, records, or other documentation whatsoever pertaining to, or composed in relation to, the injuries which the plaintiff allegedly suffered as a result of the incident which is the subject of this litigation.

8. All reports, statements, or any other documentation whatsoever regarding plaintiff's medical condition, the happening of the accident, or any other matter which is related to this litigation.

9. All notes, diaries, or any other recordings or documentations made by the plaintiff regarding the incident here involved as well as those events and circumstances leading up to and subsequent to the incident which is the subject of this litigation as well as the injuries, complaints, conditions, and losses alleged to have been sustained.

10. All reports generated by any police department or other official governmental agency concerning the accident which is the subject of this litigation.

11. All expert reports relating to liability and damages prepared by experts expected to testify at trial on behalf of plaintiff.

12. All reports, records or other documentation whatsoever pertaining to, or composed in relation to, any wage loss or time lost from work which plaintiff allegedly suffered as a result of the incident which is the subject of this litigation.

13. Produce each and every grievance and medical grievance that plaintiff has filed against Correctional Medical Services, Inc.

14. All documents requested to be identified in the Interrogatories set forth above.

15. All documents reviewed, relied upon or used in responding to the Interrogatories set forth above.

16. Any and all documents, medical reports, notes, reports of diagnostic tests, charts, diagrams, images, emergency room or ambulance reports, or any other medical records, whether generated prior to, on or following June 1, 2005, which detail any injury you claim you suffered as a result of being denied proper medical care and/or treatment.

17. All sick call slips you filed referring or relating to the allegations in your Amended Complaint and the injuries you claim you suffered.

18. All grievances you filed referring or relating to the allegations in your Amended Complaint and the injuries you claim you suffered from being denied proper medical care and/or treatment.

19. Any and all letters, grievances, notes and/or other documents you sent or authored regarding the illnesses and/or injuries you claim you suffered from being denied proper medical care and/or treatment.

20. Any and all documents which comprise any diary, journal, log, or other written account of the injuries you claim you suffered as a result of the allegations in your Amended Complaint or which describe, detail, or document any other aspect of your life since you have been incarcerated, or which relate to any aspect of your injuries which pre-exist your incarceration.

21. Any and all documents, medical reports, notes, reports of diagnostic tests, charts, diagrams, images, emergency room or ambulance reports, or any other medical records, which describe in detail your diagnosis of and treatment for any psychiatric illness.

22. Any and all documents, medical reports, notes, reports of diagnostic tests, charts, diagrams, images, emergency room or ambulance reports, or any other medical records which support or refute your claim that you were denied proper medical care or treatment.

23. With respect to each person whom you expect to call as an expert witness at or in connection with the trial or other evidentiary hearing in this case: a). all documents provided to or reviewed by the expert; b). a current curriculum vitae, resume and any other documents which describe the expert's current qualifications; c). all reports or other documents produced by the expert which express any findings, conclusions and/or opinions about any of the issues in this case; d). all documents upon which the expert's findings, conclusions and/or opinions are based; and e). all exhibits to be used as a summary of or support for the expert's findings, conclusions and/or opinions.

24. All documents you intend to introduce into evidence at the trial of this action.

MARSHALL, DENNEHEY, WARNER,  
COLEMAN & GOGGIN

BY: /s/ Kevin J. Connors, Esquire  
KEVIN J. CONNORS, ESQUIRE  
DE ID No. 2135  
1220 North Market St., 5<sup>th</sup> Floor  
P.O. Box 8888  
Wilmington, DE 19899-8888  
Attorney for Defendant,  
CORRECTIONAL MEDICAL SERVICES, INC.  
(INCORRECTLY DESIGNATED AS  
"CORRECTIONAL MEDICAL SYSTEMS")  
("CMS")

**DATED: August 21, 2007**